



To: Paul Leonard/R3/USEPA/US@EPA

_ cc:

Subject: Bagging Plant Road Corridor Study

Paul:

Please see the attached.

Rob

---- Forwarded by Bob Thomson/R3/USEPA/US on 04/12/2004 09:42 AM -----



"Herman,Paul" <peherman@deq.state. va.us> 04/05/2004 11:52 AM

To: pburton@nrvdc.org

cc: "John F. Regan (E-mail)" <john.f.regan@usace.army.mil>, "Willis,Durwood" <dhwillis@deq.state.va.us>, Bob

Thomson/R3/USEPA/US@EPA
Subject: Bagging Plant Road Corridor Study

Mr. Burton, New River Planning District Commission:

My name is Paul Herman and I am a Remediation Project Manager with the Virginia Dept. of Environmental Quality. I have a copy of the "Bagging Road Corridor Study: Dublin Eastern Industrial Access Road" (Study). I have reviewed this document and am concerned with two of the alternative routes it presents. The basis of my concern follows.

On March 23rd, I met with representatives of the US Army Corps of Engineers to conduct a cursory site investigation of a Formerly Used Defense Site (FUDS) called the New River Ordnance Plant (once the bagging operations for Radford Army Ammunition Plant). The purpose of the site investigation was to identify areas of the FUDS that will require further investigation to determine the nature and extent of any contamination present that may be attributable to former Dept. of Defense activity. A portion of this FUDS is now owned by Mar-Bal Inc. which was the subject of the investigation on the afternoon of March 23rd.

During the inspection the investigation team observed numerous (over 100) empty animal cages inside some of the old bag houses and magazines. Some of the cages had labels on them which stated "herpes I", "herpes II", and "new measles". Sub-zero refrigeration equipment, HVAC equipment, and what appeared to be an autoclave were also noticed inside the buildings.

More disconcerting was what we found outside of the buildings. In a wooded area across a street from one of the shipping magazines, the team found several shallow trenches that contained laboratory glassware and plasticware, serum-type bottles, glass slides, and animal bones (jaw bones, teeth, leg bones, vertebrae that did not appear to be indigenous). The pictures below document these findings. This area is adjacent to "Alternative Route 3", as shown in Figure 17 of the Study. "Alternative Route 1" also passes through an area that was not thoroughly investigated but may contain similar burial areas.

The nature and extent of this and possibly other "landfills" is not known at this time. My concern is that this and other landfills may contain forms of contamination that may not be evident on the ground surface but become evident if disturbed.

OHGMA

Please, let me know the current status of this project. If the project has progressed to a point where mobilization of excavation equipment is imminent, it may be necessary to delay this phase of the project until further characterization of the site may be conducted.

Thank you for your prompt response to this matter.

Respectfully,

Paul E. Herman, P.E. Office of Remediation Programs Dept. of Environmental Quality (804) 698-4464 peherman@deq.state.va.us

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